



South Carolina Department of Health
and Environmental Control

Conditional Major Air Quality Permit

Magna Sign International, LLC
224 Industrial Drive
Lexington, South Carolina 29072

In accordance with the provisions of the Pollution Control Act, Sections 48-1-50(5) and 48-1-110(a), and the 1976 Code of Laws of South Carolina, as amended, Regulation 61-62, the above named permittee is hereby granted permission to discharge air contaminants into the ambient air. The Bureau of Air Quality authorizes the operation of this facility and its applicable equipment specified herein in accordance with the Conditional Major permit request submitted on April 27, 2009.

This permit is subject to and conditioned upon the terms, limitations, standards, and schedules contained in or specified on the 11 pages, with the accompanying attachments, of this permit.

Permit Number: CM-1560-0140
Issue Date: [DRAFT]

Effective Date: [DRAFT]
Expiration Date: [DRAFT]

**Director, Engineering Services Division
Bureau of Air Quality**

RECORD OF REVISIONS		
Revision Number	Final Revision Date	Description of Change (Specific Parts, Sections, and Tables Revised or Added)

Send copies of all revisions to Permit File, Regional EQC Office, and Facility Contact.

draft

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PART 1.0 GENERAL INFORMATION

A. APPLICABLE PERMIT DATES

ISSUE DATE: <ISSUED DATE>
EFFECTIVE DATE: <EFFECTIVE DATE>
EXPIRATION DATE: <EXPIRATION DATE>

B. FACILITY INFORMATION

ENVIRONMENTAL CONTACT: Greg Brown
CONTACT TELEPHONE NUMBER: 803-808-5600 ext. 111
CONTACT FAX NUMBER: 803-808-5684
INTERNET E-MAIL ADDRESS: gbrown@magnasign.com
FACILITY LOCATION: Lexington
COUNTY: Lexington
SIC CODE(S): 7389
NAICS CODE(S): 541890
AFS CODE: 4506300140

C. FACILITY MAILING ADDRESS

FACILITY NAME: :Magna Sign International, LLC
ADDRESS : 224 Industrial Drive
CITY, STATE, ZIP CODE : Lexington, South Carolina 29072

D. FACILITY BILLING ADDRESS

FACILITY BILLING NAME: :Magna Sign International, LLC
ADDRESS : 224 Industrial Drive
CITY, STATE, ZIP CODE : Lexington, South Carolina 29072

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PART 2.0 APPLICABILITY

A. GENERAL APPLICABILITY

Condition Number	Condition
2.A.1	This permit applies to any major stationary source, as defined by SC Regulation 61-62.70.2(r), which requests and fulfills the conditions of SC Regulation 61-62.1, Section II(G) to obtain and adhere to federally enforceable permit conditions to limit the source's potential to emit less than applicable major source thresholds.

B. CRITERIA

Condition Number	Condition
2.B.1	All limitations and requirements listed as enforceable permit conditions shall be permanent, quantifiable, or otherwise enforceable in a practical manner.
2.B.2	All permit conditions that constrain the operation of a source in an effort to limit potential to emit shall be federally enforceable. Unless otherwise agreed by the SC Department of Health and Environmental Control (Department) and US Environmental Protection Agency (US EPA), the Department shall provide to US EPA on a timely basis a copy of all draft and final permits intended to be federally enforceable.
2.B.3	This facility may be required to obtain a Part 70 operating permit in accordance with SC Regulation 61-62.70 if at any time an applicable major source threshold is exceeded.

PART 3.0 GENERAL CONDITIONS

The following conditions are applicable unless superseded by specific permit condition(s):

Condition Number	Condition
3.1	The permittee must comply with all applicable statutes and regulations of the United States and the State of South Carolina and this permit does not relieve the permittee from compliance with applicable local laws, ordinances, and regulations.
3.2	This permit has been issued based on information submitted by the permittee in a Conditional Major permit application. Any false information or misrepresentation in the application may be grounds for permit revocation. This permit supersedes any other operating permit issued by the Bureau of Air Quality upon the permit's effective date.

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Condition Number	Condition
3.3	<p>In accordance with SC Regulation 61-62.1, Section II(H), the permittee shall submit an operating permit renewal request to the Department no later than 90 days prior to the operating permit expiration date. The source may be inspected by the Department in order to decide whether to renew the permit. Past records of compliance and future probability of compliance will be considered in making the decision regarding renewal.</p> <p>Submission of a request for renewal meeting the requirements in S.C. Regulation 61-62.1, Section II(H) shall allow the permittee to continue operating pursuant to the most recent conditional major operating permit, until such time as the Department has taken final action on the request for renewal. In addition to the minimum information required by S.C. Regulation 61-62.1, Section II(C), any facility requesting a conditional major operating permit must also provide the following:</p> <ul style="list-style-type: none">i. Potential emission calculations and proposed Federally enforceable emission limitations for each emission unit at the facility verifying that the total emissions at the facility will be below the major source (or facility) thresholds.ii. All proposed production and/or operational limitations that will constrain the operation of each emission unit that are to be identified as Federally enforceable.iii. All proposed monitoring parameters, recordkeeping and reporting requirements the source will use to determine and verify compliance with the requested Federally enforceable limitations on a continuous basis. The source shall also provide the compliance status of these proposed parameters and requirements at the time of the request submittal.
3.4	This permit expressly incorporates all the provisions of SC Regulation 61-62.1, Section II(J).
3.5	<p>In accordance with SC Regulation 61-62.1, Section II(J) for all sources not required to have continuous emissions monitors, in the event of any malfunction of air pollution control equipment or system, process upset or other equipment failure which results in discharges of air contaminants lasting for one hour or more and which are greater than those discharges described for normal operation in the permit application shall be reported to the local Environmental Quality Control (EQC) Regional office within twenty-four (24) hours after the beginning of the occurrence. The permittee shall also submit a written report within thirty (30) days of the occurrence. This report shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality (BAQ). The report shall contain as a minimum, the following: the identity of the emission unit and associated equipment where excess emissions occurred, the magnitude of excess emissions, the time and duration of excess emissions, the steps taken to remedy the malfunction and to prevent a recurrence, documentation that control equipment and processes were at all times maintained and operated, to the maximum extent practicable, in a manner that was consistent with good practice for minimizing emissions. Such a report shall in no way serve to excuse, otherwise justify, or in any manner affect any potential liability or enforcement action resulting from the occurrence.</p>
3.6	<p>This permit only covers emission units and control equipment while physically present at the indicated facility. Unless the permit specifically provides for the equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted facility, notwithstanding the expiration date specified on the permit.</p>
3.7	<p>In accordance with SC Regulation 61-62.1, Section II(M) within thirty (30) days of the transfer of ownership/operation of a facility, the current permit holder and prospective new owner/operator shall submit to the Department a written request for transfer of the source operating or construction permits. The written request for transfer of the source operating or construction permit shall include any changes pertaining to the company name and mailing address; the facility name and mailing address (if different from that of the company); the name, mailing address, and telephone number of the owner or agent for the company; and any proposed changes to the permitted activities of the source. Transfer of the operating or construction permits will be effective upon written approval by the Department.</p>

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Condition Number	Condition
3.8	<p>Any permittee who plans to construct, alter, or add to a source of air contaminants, including the installation of any device for the control of air contaminant discharges shall submit a complete construction permit application package as described in SC Regulation 61-62.1, Section II(C)</p> <p>A construction permit application package for a federally-enforceable construction permit will be required if any of the emissions changes described above will affect a pollutant limited under SC Regulation 61-62.1, Section II(G). The Department may grant permission to proceed with minor alterations or additions without issuance of a permit when the Department determines that the alteration or addition will not increase the quantity and will not alter the character of the source's emissions.</p>
3.9	<p>Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:</p> <ol style="list-style-type: none">1. Enter the facility where emissions-related activity is conducted, or where records must be kept under the conditions of the permit.2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit.3. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.4. As authorized by the Act and/or the SC Pollution Control Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
3.10	<p>This permit may be reopened by the Department for cause or to include any new standard or regulation which becomes applicable to a source during the life of the permit.</p>
3.11	<p>The permittee shall pay fees in accordance with SC Regulation 61-30, SC Environmental Protection Fees.</p>
3.12	<p>In the event of an emergency situation, as defined by SC Regulation 61-62.1, Section II(L), an affirmative defense to any action brought for noncompliance with an emission limitation shall be demonstrated by the facility if all of the conditions of SC Regulation 61-62.1, Section II(L) are met.</p>

PART 4.0 FACILITY WIDE REQUIREMENTS

Condition Number	Condition
4.1	<p>Air dispersion modeling (or other method) has demonstrated that this facility's operation will not interfere with the attainment and maintenance of any state or federal ambient air standard. Any changes in the parameters used in the air dispersion modeling may require a review by the facility to determine continuing compliance with these standards. These potential changes include any decrease in stack height, decrease in stack velocity, increase in stack diameter, decrease in stack exit temperature, increase in building height or building additions, increase in emission rates, decrease in distance between stack and property line, changes in vertical stack orientation, and installation of a rain cap that impedes vertical flow. Parameters that are not required in the determination will not invalidate the demonstration if they are modified. The emission rates used in the determination are listed in Attachment A of this permit. Higher emission rates may be administratively incorporated into Attachment A of this permit provided a demonstration using these higher emission rates shows the attainment and maintenance of any state or federal ambient air quality standard or with any other applicable requirement. Variations from the input parameters in the demonstration shall not constitute a violation unless the maximum allowable ambient concentrations identified in the standard are exceeded. This is a State Only enforceable requirement.</p>
4.2	<p>The owner/operator shall maintain this facility at or below the emission rates as listed in Attachment A, not to exceed the pollutant limitations of this Conditional Major operating permit. Should the facility wish to increase the emission rates listed in Attachment A, not to exceed the pollutant limitations in the body of this permit, it may do so by the administrative process specified in condition 4.1. This is a State Only enforceable requirement.</p>
4.3	<p>The permittee shall comply with SC Regulation 61-62.4 "Hazardous Air Pollution Conditions".</p>

Condition Number	Condition
4.4	The permittee shall comply with SC Regulation 61-62.2 "Prohibition of Open Burning".
4.5	The permittee shall comply with SC Regulation 61-62.6 "Control of Fugitive Particulate Matter", Section III "Control of Fugitive Particulate Matter Statewide".
4.6	<p>Limits/Standards: In accordance with SC Regulation 61-62.1, Section II(E), and SC Regulation 61-62.1, Section II(G), this facility is limited to emitting less than 10 TPY single HAP and less than 25 TPY total combined HAPs,</p> <p>Testing: Not Required</p> <p>Monitoring/Record Keeping/Reporting/Other: The owner/operator shall maintain records of all hazardous air pollutants (HAP). These records shall include the total amount of each material used, the HAP content in percent by weight of each material, and any other records necessary to determine facility wide HAP emissions. HAP emissions shall be calculated on a monthly basis, and a twelve-month rolling sum shall be calculated for total HAP emissions. The twelve-month rolling sum shall be less 10 tons of a single HAP and 25 tons of total HAPs. Reports of the calculated values and the twelve-month rolling sum shall be submitted annual.</p> <p>An algorithm, including example calculations and emission factors, explaining the method used to determine emission rates shall be included in the initial report. Subsequent submittals of the algorithm and example calculations are unnecessary, unless the method of calculation is found to be unacceptable by the Bureau or if the facility changes the method of calculating emissions and/or changes emission factors.</p>

PART 5.0 EMISSION UNIT REQUIREMENTS

A. EMISSION UNIT DESCRIPTION

TABLE 5.1 EMISSION UNITS		
Unit ID	Unit Description	Control Device
01	Paint Booth No.1	Filter

N/A = Not Applicable

TABLE 5.2 CONTROL DEVICES			
Control Device ID	Control Device Description	Installation Date	Pollutant(s) Controlled
Filt1	Envira-Max Exhaust Filter - Two piece Styrofoam baffle paint arrester filter	2000	PM/PM ₁₀

N/A = Not Applicable

B. GENERIC CONDITIONS

GENERIC CONDITIONS			
Condition Number	Unit ID	Equipment ID	Condition
GC1	01	All sources	Unless elsewhere specified within this permit, all records required to demonstrate compliance with the limits established under this permit shall be maintained on site for a period of at least five (5) years from the date generated and shall be made available to a Department representative upon request.

GENERIC CONDITIONS			
Condition Number	Unit ID	Equipment ID	Condition
GC2	01	All sources	<p>Unless elsewhere specified within this permit, all reports required under this permit including all recorded parameters and calculated values shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality, at the address listed below, postmarked no later than thirty (30) calendar days after the end of the reporting period.</p> <p style="text-align: right;">SC DHEC - BAQ Technical Management Section 2600 Bull Street Columbia, SC 29201</p>
GC3	01	All Sources	<p>This facility is subject to the provisions of 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants, Subparts A and HHHHHH (Miscellaneous Surface Coating (Plastic Parts and Auto body Refinishing Paint Shops)). Existing affected sources shall comply with the applicable provisions by the compliance date specified in Subpart HHHHHH. Any new affected sources shall comply with the requirements of these Subparts upon initial start-up unless otherwise noted.</p>

C. EMISSION UNIT – LIMITATIONS, MONITORING AND REPORTING

Table 5.3 - Unit ID 01 - Paint Booth No.1

Equipment ID	Description	Installation Date/ Modification Date	Control Device ID	Stack ID
Paint Booth No.1	Paint Booth No.1 - Used to spray paint molded plastic signs	2000	Filt1	Paint Booth No.1

Table 5.4 - Control Device For Unit ID 01 - Paint Booth No.1

Control Device ID	Description	Installation Date/ Modification Date	Pollutant(s) Controlled
Filt1	Envira-Max Exhaust Filter - Two piece Styrofoam baffle paint arrester filter	2000	PM/PM ₁₀

Conditions For Unit ID 01 - Paint Booth No.1

Condition Number	Equip ID	Regulated Pollutant/ Standard	Conditions
01.1	Paint Booth No.1	Opacity	<p>Limits/Standards: In accordance with SC Regulation 61-62.5, Standard No. 4 - Emissions from Process Industries, Section IX - Visible Emissions (Where Not Specified Elsewhere), where construction or modification began after December 31, 1985, emissions (including fugitive emissions) shall not exhibit an opacity greater than 20%.</p> <p>Testing: Not Required</p> <p>Monitoring/Record Keeping/Reporting/Other: None</p>

Conditions For Unit ID 01 - Paint Booth No.1									
Condition Number	Equip ID	Regulated Pollutant/ Standard	Conditions						
01.2	Paint Booth No.1	PM	Limits/Standards: In accordance with SC Regulation 61-62.5, Standard No. 4 - Emissions from Process Industries, Section VIII - Other Manufacturing, particulate matter emissions shall be limited to the rate specified by use of the following equations: for process weight rates less than or equal to 30 tons per hour ($E = 4.10P^{0.67}$) and for process weight rates greater than 30 tons per hour ($E = 55.0P^{0.11} - 40$) where E = the allowable emission rate in pounds per hour and P = process weight rate in tons per hour. As such, each process's allowable particulate matter emission limit is limited to the amount shown in the table below at its nominal production rating: <table><tr><th>Process</th><th>Emission Limit (lbs/hr)</th><th>Process Weight Rate (tons/hr)</th></tr><tr><td>01</td><td>0.078</td><td>0.0027</td></tr></table>	Process	Emission Limit (lbs/hr)	Process Weight Rate (tons/hr)	01	0.078	0.0027
			Process	Emission Limit (lbs/hr)	Process Weight Rate (tons/hr)				
01	0.078	0.0027							
Testing: Not Required									
Monitoring/Record Keeping/Reporting/Other: The Envira-Max Exhaust Filter - Two piece Styrofoam baffle paint arrester filter shall be operational and in place at all times when equipment or processes controlled by filter are operating. A schedule shall be implemented for the daily inspection and regular cleaning or replacement of the filter. Records of these events shall be entered in a permanent media and maintained on site.									
01.3	Paint Booth No.1	Hours of Operation	Limits/Standards: This source is limited to an eight (8) hours per day operating level in order to comply with SC Regulation 61-62.5, Standards No. 2 (Ambient Air Quality Standards), No. 7 (Prevention of Significant Deterioration), and No. 8 (Toxic Air Pollutants).						
			Testing: Not Required						
Monitoring/Record Keeping/Reporting/Other: The owner/operator must record operating time daily. Any increase in allowable emission rate must be approved by the Bureau of Air Quality and may require re-modeling to demonstrate compliance with the above listed standards. Reports of the operating time shall be submitted semiannual. This is a State Only requirement.									

PART 6.0 REPORTING REQUIREMENTS

TABLE 6.1 PERIODIC REPORTING SCHEDULE

Compliance Monitoring Report Submittal Frequency	Reporting Period (Begins on the effective date of the permit)	Report Due Date
Quarterly	January-March April-June July-September October-December	April 30 th July 30 th October 30 th January 30 th
Semiannual	January-June April-September July-December October-March	July 30 th October 30 th January 30 th April 30 th

TABLE 6.1 PERIODIC REPORTING SCHEDULE

Compliance Monitoring Report Submittal Frequency	Reporting Period (Begins on the effective date of the permit)	Report Due Date
Annual	January-December April-March July-June October-September	January 30 th April 30 th July 30 th October 30 th

Note: This reporting schedule does not supercede any Federal reporting requirements including but not limited to 40 CFR 60, 61, and 63. All Federal reports must meet the reporting time frames specified in the Federal standard unless the Department or EPA approves a change.

PART 7.0 ADDITIONAL CONDITIONS

A. SPECIFIC CONDITIONS

Condition Number	Conditions
7.A.1	<p>Emergency power generators have been determined to be exempt from construction permitting requirements in accordance with South Carolina Regulation 61-62.1 Section II.B.2.f and as such are listed as exempt sources in this permit. These sources shall still comply with the requirements of all applicable regulations including but not limited to:</p> <ul style="list-style-type: none"> New Source Performance Standards (NSPS) 40 CFR 60 Subparts A (General Provisions); IIII (Stationary Compression Ignition Internal Combustion Engines); and JJJJ (Stationary Spark Ignition Internal Combustion Engines)

B. EXEMPT SOURCES

Equip ID	Source Description (Date Listed)	Exemption Basis
N/A	N/A	N/A

N/A = Not Applicable

ATTACHMENT A

Modeled Emission Rates Magna Sign International, LLC CM-1560-0140 PAGE 1 OF 1

AMBIENT AIR QUALITY STANDARDS - STANDARD 2					
STACK	Modeled Emission Rates (lbs/hr)				
	TSP	PM₁₀	SO₂	NO_x	CO
EP01 – Paint Booth No. 1	0.007	0.007	--	--	--

AMBIENT AIR QUALITY STANDARDS - STANDARD 2		
STACK	Modeled Emission Rates (lbs/hr)	
	Lead	Gaseous Fluorides (as HF)
EP01 – Paint Booth No. 1	0.0062	--

CLASS II PREVENTION OF SIGNIFICANT DETERIORATION - STANDARD 7			
STACK	Modeled Emission Rates (lbs/hr)		
	PM₁₀	SO₂	NO_x
EP01 – Paint Booth No. 1	0.007	--	--

TOXIC AIR POLLUTANTS MODELED - STANDARD 8					
STACK	Modeled Emission Rates (lbs/hr)				
	Cumene 98-82-8	Dimethyl Phthalate 131-11-3	Hexamethylene-1,6- diisocyanate 822-06-0	Toluene 108-88-3	Toluene-2,4- diisocyanate 584-84-9
EP01 – Paint Booth No. 1	0.1270	0.1976	0.0053	3.2544	0.0053

AIR TOXICS – LEVEL I DE MINIMIS ANALYSIS		
POLLUTANT	CAS Number	Modeled Emission Rates (lbs/hr)
Chlorobenzene	108-90-7	0.1088
Chromium +6 Compounds	N/A	0.0088
Cobalt Compounds	N/A	1.28E-05
Ethylbenzene	100-41-4	2.744
Ethylene Glycol	107-21-1	1.4096
Formaldehyde	50-00-0	0.0072
Glycol Ethers	N/A	22.828
Methanol	67-56-1	7.4888
Methyl Ethyl Ketone	78-93-3	25.6992
Methyl Isobutyl Ketone	108-10-1	3.5736
Naphthalene	91-20-3	1.0472
Nickel	7440-02-0	0.0008
Phosphoric Acid	7664-38-2	0.0136
Styrene	100-42-5	5.22
Xylene	1330-20-7	12.1976

CURRENT DATE

Magna Sign International, LLC
224 Industrial Drive
Lexington, SC 29072

ATTENTION: Greg Brown

Dear Mr. Brown:

Enclosed with this letter is Permit No. CM-1560-0140 that takes effect on [DATE]. This conditional major operating permit will limit the facility's potential to emit to below Title V Major Source thresholds, thereby restricting it from Title V Major Source status as defined in SC Regulation 61-62.70, "Title V Operating Permit Program." Please note the conditions and limitations imposed. This permit will be valid through EXPIRATION DATE. Pursuant to the South Carolina Administrative Procedures Act, this permit decision may be appealed in accordance with applicable state law. Please see the enclosed Notice of Appeal Procedure, effective July 01, 2006, for guidelines on appeal submittals.

Please be advised that the effective date of this permit begins the facility's reporting period under the terms and conditions of this permit. Abbreviated periodic reports shall be completed and submitted in accordance with the previous permit's conditions and shall cover the interim period between the previous permit reporting period and the new permit reporting period.

Please examine this new permit carefully for errors or omissions and notify the appropriate staff member, Mareesa Singleton, (803-898-4113) or e-mail at singlemj@dhec.sc.gov promptly if any are discovered.

Thank you for your cooperation.

Sincerely,

Elizabeth J. Basil, Director
Engineering Services Division
Bureau of Air Quality

EJB:MJS:<TYPIST'S INITIALS>

Enclosures

cc: Harry Mathis, Region 3, Columbia EQC Office
Conditional Major File: 1560-0140

Notice of Appeal Procedure

The following procedures are in effect beginning July 1, 2006, pursuant to 2006 Act No. 387:

1. This decision of the S.C. Department of Health and Environmental Control (Department) becomes the final agency decision 15 days after notice of the decision has been mailed to the applicant or respondent, unless a written request for final review is filed with the Department by the applicant, permittee, licensee, or affected person.
2. An applicant, permittee, licensee, or affected person who wishes to appeal this decision must file a written request for final review with the Clerk of the Board at the following address or by facsimile at 803-898-3393.

Clerk of the Board
SC DHEC
2600 Bull Street
Columbia, SC 29201

3. The request for final review should include the following:
 - a. the grounds on which the Department's decision is challenged and the specific changes sought in the decision
 - b. a statement of any significant issues or factors the Board should consider in deciding how to handle the matter
 - c. a copy of the Department's decision or action under review
4. In order to be timely, a request for final review must be received by the Clerk of the Board within 15 days after notice of the decision has been mailed to the applicant or respondent. If the 15th day occurs on a weekend or State holiday, the request is due to be received by the Clerk of the Board on the next working day. The request for final review must be received by the Clerk of the Board by 5:00 p.m. on the date it is due.
5. If a timely request for final review is filed with the Clerk of the Board, the Clerk will provide additional information regarding procedures.
6. The Board of Health and Environmental Control has 60 days from the date of receipt of a request for final review to conduct a final review conference. The conference may be conducted by the Board, its designee, or a committee of three members of the Board appointed by the chair.
7. If a final review conference is not conducted within 60 days, the Department decision becomes the final agency decision, and a party may request a contested case hearing before the Administrative Law Court within 30 days after the deadline for the final review conference.

The above information is provided as a courtesy; parties are responsible for complying with all applicable legal requirements.